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Presentment Date: February 20, 2019 12:00 PM

Objection Date: February 13, 2019

Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

WALTER FRESHMAN TRUST A, a Florida trust,
WALTER FRESHMAN REVOCABLE TRUST
DATED 12/31/92, a Florida trust, FRIEDA
FRESHMAN REVOCABLE TRSUT DATED
12/31/92, A Florida trust, FRIEDA FRESHMAN as
trustor, as trustee and as an individual, AMANDA
LEFKOWITZ, and IAN LEFKOWITZ,

Defendants.

Adv. Pro. No. 10-05026 (SMB)

**NOTICE OF PRESENTMENT OF AN ORDER
GRANTING APPLICATION TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Helen Davis Chaitman in Support of Application to Withdraw as Counsel, dated January 30, 2019 Chaitman LLP, attorney of record for Defendants, Walter Freshman Trust A, a Florida trust, Walter Freshman Revocable Trust Dated 12/31/92, a Florida trust, Frieda Freshman Revocable Trust Dated 12/31/92, A Florida trust, Frieda Freshman as trustor, as trustee and as an individual, Amanda Lefkowitz, and Ian Lefkowitz, (the “Defendants”), will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at One Bowling Green, New York, NY 10004, for signature on February 20, 2019 at 12:00 PM.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and copies of such objection are served so as to be delivered to the undersigned, along with counsel to the Trustee, and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: January 30, 2019
New York, New York

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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